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Attorneys for Plaintiffs
 TC Rich, LLC, Rifle Freight, Inc., Fleischer Customs Brokers, Richard G.
 Fleischer, and Jacqueline Fleischer

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TC RICH, LLC, a California Limited
 Liability Company, RIFLE FREIGHT,
 INC., a California corporation,
 FLEISCHER CUSTOMS BROKERS, a
 sole proprietorship, RICHARD G.
 FLEISCHER, an individual, and
 JACQUELINE FLEISCHER, an
 individual,

Plaintiffs,

v.

PACIFICA CHEMICAL,
 INCORPORATED, a California
 corporation, AQUA SCIENCE
 ENGINEERS, INC., a California
 Corporation, A/E WEST
 CONSULTANTS, INC., a Nevada
 Corporation, and DOES 1 through 10,
 inclusive,

Defendants.

Case No. CV 15-4878 DMG (AGRx)

Assigned to the Hon. Dolly M. Gee

**NINTH FURTHER JOINT
 QUARTERLY STATUS REPORT
 AS ORDERED BY THE COURT**

Action filed: June 26, 2015

Discovery: Stayed

Trial date: None set

1 The parties jointly submit this Ninth Further Joint Status Report.

2 The eight prior joint reports were filed on:

- 3 1. January 19, 2018 (Dkt. 91);
- 4 2. October 19, 2018 [Dkt. 96];
- 5 3. November 14, 2018 [Dkt. 98];
- 6 4. February 7, 2019 [Dkt. 100];
- 7 5. February 28, 2019 [Dkt. 103];
- 8 6. May 14, 2019 [Dkt. 117];
- 9 7. August 14, 2019 [Dkt. 118]; and
- 10 8. November 14, 2019 [Dkt. 119].

11 This Ninth Further Joint Quarterly Status Report addresses the status of the
12 site investigation of the environmental contamination and likely returning to
13 mediation to conduct a second session.

14 1. Site Investigation

15 Pacifica implemented an enhanced reductive dechlorination (“ERD”) Pilot
16 Test in July 2019. The purpose of the ERD Pilot Test is to obtain information that
17 will assist in an appropriate full-scale groundwater remediation design, including
18 evaluation of the effectiveness of ERD, which is to include bioaugmentation. From
19 July 8 to 26, 2019, and from August 12 to 23, 2019, Pacifica Chemical’s
20 environmental contractor (“Murex”) performed pilot study injections of QRS-SL
21 Plus, a sodium lactate and emulsified vegetable oil product and amended with
22 sodium bicarbonate, followed by a Dehalococcoides (DHC) bacteria in the form of
23 microbial consortium TSI-DC culture.

24 Following the injection, Murex has been collecting performance data from
25 wells within the study area (monitoring events), which also serves the dual purpose
26 of Waste Discharge Reporting (WDR) monitoring and reporting. Murex has
27 conducted two post-injection monitoring events and is currently conducting
28 quarterly groundwater monitoring and sampling. VOC data in groundwater suggests

1 that significant reductive dichlorination may be occurring in one of the four wells
 2 within the pilot test area. Ongoing monitoring will continue to evaluate VOC trends
 3 and will be documented in quarterly groundwater monitoring and WDR reports.
 4 Murex will conduct another this month before reporting on the pilot test to DTSC in
 5 April 2020.

6 2. Mediation

7 The parties continue to anticipate returning to mediation with Mr. Gallagher.
 8 Defendant contends that the most opportune time to return is after the pilot test
 9 report is submitted to DTSC in April 2020 to assist in better estimating future
 10 remedial costs. Plaintiffs agree that a reliable estimate of future costs is important
 11 but are concerned that the parties are otherwise in disagreement regarding realistic
 12 assessments of relative liability. Nonetheless, the parties continue to believe that
 13 areas of dispute and agreement were identified with Mr. Gallagher's assistance on
 14 February 22, 2019 and conclude that a further session after more is known about the
 15 extent of contamination and remedial options available to address it will better
 16 position the parties in their efforts to achieve a settlement.

17
 18 Dated: February 14, 2020

RAINES FELDMAN LLP

19
 20 /s/ John S. Cha

21 _____
 22 John S. Cha
 23 Counsel for Plaintiffs

24 Dated: February 14, 2020

**PILLSBURY WINTHROP SHAW
 PITTMAN LLP**

25
 26 /s/ Mark Elliot

27 _____
 28 Mark Elliott
 Counsel for Plaintiffs

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Dated: February 14, 2020

PALADIN LAW GROUP® LLP

/s/ Bret A. Stone

Bret A. Stone
Counsel for Defendants Pacifica Chemical,
Incorporated

Dated: February 14, 2020

FOLEY & LARDNER LLP

/s/ Sarah A. Slack

Sarah A. Slack
Counsel for Plaintiff-Intervenor